

## SECTION II—REMARKS

Applicants thank the Examiner for a thorough review, and respectfully request reconsideration of the above referenced patent application for the following reasons:

### **Claims 1, 5, 11-12, 16-17, 23, 28, 33, and 34 rejected under 35 U.S.C. § 103(a)**

The PTO rejected claims 1, 5, 11-12, 16-17, 23, 28, 33, and 34 under 35 U.S.C. § 103(a) as being unpatentable over US Patent 4,939,644 to Harrington et al. (“Harrington”) and further in view of US Patent 4,783,730 to Fischer (“Fischer”).

### **Independent claim 1**

Claim 1 recites in pertinent part:

A computer implemented method comprising ... issuing a plurality of operational descriptors to a controller ... wherein each operational descriptor includes a command ...

**indicating the completion status of each command in a second order**, wherein the second order is different from the first order, and wherein **indicating the completion status of at least one command occurs prior to the completion of the remaining commands**.

Applicants respectfully submit that independent claim 1 as amended herein finds support in the original specification at page 9, lines 9-16.

Applicants further submit that claim 1 as amended herein is in condition for allowance because neither Harrington nor Fischer discloses, **“indicating the completion status of at least one command [] prior to the completion of the remaining commands.”** In particular, Harrington discloses that “suitable status information” is not provided until “a complete sequence of commands ... has been performed.” Refer to Harrington at column 4, lines 49-55.

Fischer is silent with regard to this limitation, and therefore cannot cure the deficiencies of Harrington.

Because Harrington and Fischer fail to disclose each and every limitation in as complete detail as Applicants recite in independent claim 1 as amended herein, Applicants respectfully submit that said claim is in condition for allowance.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to claim 1 under 35 U.S.C. § 103(a).

Independent claim 23

Independent claim 23 as amended herein recites in pertinent part:

An apparatus comprising: a controller to accept a plurality of operational descriptors ... each operational descriptor includes a command, **an order indicator to enforce execution of commands in a specific order**, and a value to be written upon completion of the command ... .

Applicants respectfully submit that independent claim 23 as amended herein is in condition for allowance as both Harrington and Fischer fail to disclose “**an order indicator to enforce execution of commands in a specific order.**” Because Harrington and Fischer fail to disclose each and every element in as complete detail as Applicants recite in claim 23, Applicants respectfully submit that said claim is in condition for allowance. Furthermore, Applicants respectfully submit that claim 23 does not contain new subject matter, but rather finds support in the original specification at page 9, lines 16-22 as discussed below with reference to new claims 35-38.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to independent claim 23 under 35 U.S.C. § 103(a).

Independent claims 12, 28, and 33

Independent claim 12 as previously presented recites in pertinent part:

An article of manufacture, comprising: a machine-readable medium having instructions stored thereon to: issue a plurality of operational descriptors from a controller ... each operational descriptor includes a command ... a completion status of the command will be written, and **a value to be written upon completion of the command ...**

Harrington fails to disclose **“a value to be written upon completion of the command”** as applicants recite in claim 12. As the PTO points out, Harrington does state “[o]nce a complete sequence of commands ... has been performed” return information is sent to the host. Refer to Harrington, column 4, lines 49-53. Further, the PTO points out that Fischer states, “[a] done status indicates that processing of the command ... has been completed ... and that the completion status has been returned.” Refer to Fischer column 11, lines 6-10. However, even when combined, Harrington and Fischer fail to disclose **“a value to be written upon completion of the command”** as Applicants recite in independent claim 12 previously presented. In particular, Applicants claim that the “completion status” is written **“upon completion of the command.”** This is different from Harrington whom discloses “[o]nce a complete sequence of commands ... has been performed,” and it is different from Fischer, who is silent as to **when in time** the completion status is written, only disclosing that the “done status” indicates processing “has been completed [and] the completion status has been returned.”

Because the combination of Harrington and Fisher fail to disclose each and every limitation as Applicants recite in claim 12 as previously presented, Applicants respectfully submit that said claim is in condition for allowance. Further, independent claims 28 and 33 as

previously presented contain similar limitations to those of claim 12, and therefore are also in condition for allowance.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to independent claims 12, 28, and 33 under 35 U.S.C. § 103(a).

**Dependent claims 5, 11, 16-17, and 34**

Regardless of what Harrington and Fischer may or may not disclose, claims 5, 11, 16-17, and 34 are each dependent claims that depend on allowable independent claims as discussed immediately above with reference to the § 103(a) rejection of the corresponding independent base claims. As dependent claims, each necessarily incorporates the limitations of the independent claims upon which they depend, and therefore each is in condition for allowance.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to claims 5, 11, 16-17, and 34 under § 103(a).

**Claims 3, 4, 14, and 15 rejected under 35 U.S.C. § 103(a)**

The PTO rejected claims 3, 4, 14, and 15 under 35 U.S.C. § 103(a) as being unpatentable over Harrington, in view of Fischer, and further in view of US Patent 4,366,536 to Kohn (“Kohn”).

Regardless of what Harrington, Fischer, and Kohn may or may not disclose, claims 3, 4, 14, and 15 are each dependent claims that depend on allowable independent claims as discussed above with reference to the § 103(a) rejection of the corresponding independent base claims. As dependent claims, each necessarily incorporates the limitations of the independent claims upon which they depend, and therefore each is in condition for allowance.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to claims 3, 4, 14, and 15 under § 103(a).

**Claims 6-9, 18-21, 25-26, and 30-31 rejected under 35 U.S.C. § 103(a)**

The PTO rejected claims 6-9, 18-21, 25-26, and 30-31 under 35 U.S.C. § 103(a) as being unpatentable over Harrington, in view of Fischer as applied to claim 1, and further in view of US Patent 6,567,862 to Saito (“Saito”).

**Dependent claims 7 and 8 amended pursuant to 37 C.F.R. § 1.116(b)(2)**

Applicants have elected to amend dependent claims 7 and 8 herein in an effort to present the rejected claims in better form for consideration on appeal pursuant to 37 C.F.R. § 1.116(b)(2). Applicants respectfully submit claims were not amended to overcome the PTO’s rejection, and Applicants further submit that amendment does not add new subject matter.

**Dependent claims 6-9, 18-21, 25-26, and 30-31**

Regardless of what Harrington, Fischer, and Saito may or may not disclose, claims 6-9, 18-21, 25-26, and 30-31 are each dependent claims that depend on allowable independent claims as discussed above with reference to the § 103(a) rejection of the corresponding independent base claims. As dependent claims, each necessarily incorporates the limitations of the independent claims upon which they depend, and therefore each is in condition for allowance.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to claims 6-9, 18-21, 25-26, and 30-31 under § 103(a).

**Claims 10, 22, 27, and 32 rejected under 35 U.S.C. § 103(a)**

The PTO rejected claims 10, 22, 27, and 32 under 35 U.S.C. § 103(a) as being unpatentable over Harrington, in view of Fischer as applied to claim 1, in view of Saito, and further in view of US Patent 6,088,740 to Ghaffari et al. (“Ghaffari”).

**Dependent claim 10**

The PTO rejected dependent claim 10 on the basis that Ghaffari discloses “a single memory location” and that it would have been obvious “to combine the teaching[s] of Harrington, Fischer, Saito and Ghaffari.” The PTO relies upon Ghaffari at column 4, lines 4-10 for this assertion which states in pertinent part:

The processor memory 122 of the local processor complex 120 is illustrated with contents including a set of n Command Blocks 210-211 and m scatter/gather address lists, the fields of which are disclosed in the text accompanying FIGS. 5-6.

Dependent claim 10 as presented herein recites “The computer implemented method of claim 6 wherein **each block of memory comprises a single memory location.**” The passage from Ghaffari upon which the PTO relies is silent with regard to “**each block of memory comprises a single memory location.**” Ghaffari appears to describe the “local processor complex” having multiple “Command Blocks,” and also multiple “scatter/gather address lists,” but it fails to disclose “**a single memory location**” comprised within “**each block of memory.**”

Because Ghaffari fails to disclose each and every limitation in as complete detail as recited by dependent claim 10 it cannot cure the deficiencies of Harrington, Fischer, and Saito, regardless of whether or not they disclose the limitations the PTO asserts.

Accordingly, Applicants respectfully submit that claim 10 is in condition for allowance as previously presented and respectfully request the PTO withdraw its rejection to claim 10 under 35 U.S.C. § 103(a).

**Dependent claims 10, 22, 27, and 32**

Regardless of what Ghaffari, Harrington, Fischer, and Saito may or may not disclose, claims 10, 22, 27, and 32 are each dependent claims that depend on allowable independent claims as discussed above with reference to the § 103(a) rejection of the corresponding independent base claims. As dependent claims, each necessarily incorporates the limitations of the independent claims upon which they depend, and therefore each is in condition for allowance.

Accordingly, Applicants respectfully request the PTO withdraw its rejection to claims 10, 22, 27, and 32 under § 103(a).

**New claims 35-38**

New claims 35-38 are presented herein. Applicants respectfully submit that said claims find support in the original specification at page 9, lines 16-22. Furthermore, Applicants respectfully submit that the limitations claims 35-38 recite are not disclosed by the prior art of record.

Accordingly, Applicants respectfully submit that new claims 35-38 as presented herein are in condition for allowance and request that the PTO allow said claims.

## CONCLUSION

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked subject matter in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such subject matter may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (503) 439-8778.


### Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Gregory D. Caldwell  
Attorney for Applicants  
Registration No. 39,926

Blakely, Sokoloff, Taylor & Zafman LLP  
12400 Wilshire Boulevard, Seventh Floor  
Los Angeles CA 90025-1030  
Phone: (503) 439-8778  
Facsimile: (503) 439-6073